RABINOWITZ, LUBETKIN & TULLY, LLC

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

Case No. 19-13273 (VFP)

IMMUNE PHARMACEUTICALS INC., et al.,

Chapter 7

Debtors.

Jointly Administered

JEFFREY A. LESTER, CHAPTER 7 TRUSTEE FOR IMMUNE PHARMACEUTICALS, INC., et al., Adv. Pro. No. 19-02033 (VFP)

Plaintiff,

Oral Argument Requested

Hearing Date: June 15, 2021 at 10:00 A.M.

v.

DISCOVER GROWTH FUND, LLC,

Defendant.

NOTICE OF MOTION OF JEFFREY A. LESTER, CHAPTER 7 TRUSTEE, FOR EXTENSION OF DISCOVERY DEADLINES

PLEASE TAKE NOTICE that Jeffrey A. Lester, Chapter 7 Trustee (the "Trustee") for the bankruptcy estates of Immune Pharmaceuticals Inc. and related debtors, and Plaintiff in the above-captioned adversary proceeding, shall move before this Court on June 15, 2021 at 10:00

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A.M. or as soon thereafter as counsel may be heard for entry of an order extending the current discovery deadlines in the within adversary proceeding for sixty (60) days.

PLEASE TAKE FURTHER NOTICE that the Trustee relies upon the Motion and Certification filed herewith and submits that a formal Brief is not necessary because the governing law is not complex.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-2(a), any opposition to the Motion must be filed and served within 7 days of the hearing date.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-3(d), the Motion will be decided on the papers unless opposition is filed.

Dated: May 24, 2021 Livingston, New Jersey **RABINOWITZ, LUBETKIN & TULLY, LLC** Attorneys for Jeffrey A. Lester, Chapter 7 Trustee

By: ____/s/ Barry J. Roy BARRY J. ROY